IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

The County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al., Case No. 18-op-45090

and

The County of Cuyahoga v. Purdue Pharma L.P., et al., Case No. 1:18-op-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DEFENDANTS' NOTICE OF FILING REDACTED DEPOSITION TRANSCRIPTS CITED IN MOTIONS FOR SUMMARY JUDGMENT AND *DAUBERT* MOTIONS PURSUANT TO ORDER AMENDING PROCEDURES REGARDING REDACTIONS AND FILING OF BRIEFS UNDER SEAL [DOCKET NO. 1813]

Pursuant to the Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal, dated July 5, 2019 [Dckt 1813], Defendants provide this notice of filing the attached deposition transcripts with proposed redactions, which are exhibits to the parties' motions for summary judgment and *Daubert* motions.

Dated: July 24, 2019 Respectfully submitted,

/s/ Mark S. Cheffo
Mark S. Cheffo
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Tel: (212) 698-3500
Mark.Cheffo@dechert.com

Counsel for Defendants Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company

Co-Liaison Counsel for the Manufacturer Defendants

/s/ Carole S. Rendon

Carole S. Rendon

BAKER & HOSTETLER LLP

Key Tower 127 Public Square, Suite 2000

Cleveland, OH 44114-1214 Telephone: (216) 621- 0200

Fax: (216) 696-0740 crendon@bakerlaw.com

Counsel for Defendants Endo Health Solutions Inc. and Endo Pharmaceuticals Inc.; Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc.

Co-Liaison Counsel for the Manufacturer **Defendants**

/s/ Enu Mainigi

WILLIAMS & CONNOLLY LLP

Enu Mainigi

725 Twelfth Street, N.W.

Washington, DC 20005

Telephone: (202) 434-5000

Fax: (202) 434-5029 emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

Co-Liaison Counsel for the Distributor Defendants

/s/ Shannon E. McClure

Shannon E. McClure

REED SMITH LLP

Three Logan Square

1717 Arch Street, Suite 3100

Philadelphia, PA 19103

Telephone: (215) 851-8100

Fax: (215) 851-1420

smcclure@reedsmith.com

Counsel for Defendant AmerisourceBergen Drug

Corporation

Co-Liaison Counsel for the Distributor Defendants

/s/ Geoffrey Hobart

Geoffrey Hobart

COVINGTON & BURLING LLP

One CityCenter, 850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: (202) 662-5281

ghobart@cov.com

Counsel for Defendant McKesson Corporation

Co-Liaison Counsel for the Distributor Defendants

<u>/s/ Kaspar Stoffelmayr</u> Kaspar Stoffelmayr BARTLIT BECK LLP 54 West Hubbard Street Chicago, IL 60654 Telephone: (312) 494-4400 Fax: (312) 494-4440

kaspar.stoffelmayr@bartlitbeck.com

Counsel for the Walgreens Defendants

Liaison Counsel for the Chain Pharmacy Defendants

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing document was served via the

Court's ECF system to all counsel of record on July 24, 2019.

/s/ Geoffrey Hobart
Geoffrey E. Hobart
Mark Lynch
COVINGTON & BURLING LLP

One CityCenter 850 Tenth Street NW Washington, DC 20001 Tel: (202) 662-5281 ghobart@cov.com mlynch@cov.com

Counsel for McKesson Corporation

Co-Liaison Counsel for the Distributor Defendants